

### REMARKS

Claims 1-36 are pending in the application. The Office has rejected claims 1, 5-12, 16-23, and 27-33 under 35 USC § 102(e) as being anticipated by Subramanian *et al.* (US Pat. No. 6,718,320). Claims 2-3, 13-14, and 24-25 stand rejected under 35 USC § 103(a) as unpatentable over Subramanian *et al.* (US Pat. No. 6,718,320) in view of Hotti *et al.* (US Pat. Application No. 2002/0169745). The Office has allowed claims 33-36. Applicant will address the allowed claims after the Office has reviewed this reply. This Office action is final and is responsive to a communication filed on or about August 23, 2004.

#### 102 Rejection (Claims 1, 12, and 23)

Applicant respectfully maintains that Subramanian does not teach "generating a copy of the portion of the multiple database structure using the ordered set of object definitions" as required by Applicant. In rebuttal to Applicant's position, the Office contends that Subramanian does contain these elements because Subramanian teaches using schema mapping and operators to generate restructuring view map tables and to generate restructuring views. Applicant submits that Subramanian's teaching does not anticipate Applicant's required elements.

The Cambridge Online Dictionary gives the following first definition for the word "copy" when used as a noun: "Something that has been made to be exactly like something else." With this plain-English definition in mind, the restructuring views used by Subramanian clearly are not copies of either their base tables or of any structures. Subramanian, in fact, never claims that they are copies; he instead uses the term "restructurings." When comparing restructuring views to their base tables, Subramanian states that the restructuring views have "heterogeneous formatting or schemas" (col. 1, lines 17-29). Using the above definition, a copy of something is not the same as a restructuring of that thing. In the type of system described by Subramanian, a copy could not exhibit heterogeneous formatting or schemas. The Office, therefore, has improperly equated a "copy" to a "restructuring," as those terms are used by Applicant and by Subramanian, respectively.

Furthermore, having a schema or a definition of a structure is not the same as having a copy of the structure. A person of ordinary skill would understand that a database schema is nothing more than a description of a database structure. When something is said to have been copied, there is an expectation that the copy is more than a mere description. A schema, being just a description of a structure, cannot be said to be a copy of the structure. Subramanian's restructuring views simply do not embody the elements of Applicant's claims.

Additionally, Applicant cannot find within Subramanian the element of "recursively retrieving object definitions for one or more database objects associated with a query ...," as required by Applicant. Subramanian does teach retrieving schema definitions, but Subramanian does not show or suggest that the retrieving operation is performed recursively.

Finally, Applicant cannot find within Subramanian any teaching to suggest that "the object definition for the view is qualified with a containing database identifier," as required by Applicant. Subramanian does teach schema mapping between two or more databases, but he does not show or suggest the step of qualifying an object definition with a containing database identifier. Furthermore, Subramanian does not even show or suggest a need for such a qualifier. This element is missing from Subramanian.

Subramanian is missing at least the three elements described above and required by Applicant. The 102 rejection over Subramanian is therefore improper and Applicant's claims are allowable over this reference.

### 103 Rejection

Hotti does not show or suggest "generating a copy of the portion of the multiple database structure using the ordered set of object definitions" as required by Applicant. Hotti teaches a method for managing and coordinating updates to database schemas and related application software in a large distributed multi-database system. The above elements are missing from Hotti. Accordingly, even when combined with Subramanian, Hotti fails to show or suggest the subject of Applicant's claims. All of the claims are therefore allowable over these references.

**Rejection of the Dependent Claims**

Claims depending from rejected independent claims are allowable for at least the same reasons presented above.

CONCLUSION

Neither Subramanian nor Hotti, whether taken separately or together, shows or suggests all of the elements of Applicant's claims. Therefore, all claims are allowable over the art of record. Applicant asks the Office to reconsider this application and allow all claims. Please charge any fees that might be due, excluding the issue fee, to deposit account 14-0225.

Respectfully Submitted,

Date: 4-21-2005



Harden E. Stevens, III  
Reg. No. 55,649

NCR Corporation  
1700 South Patterson Blvd.  
Dayton, Ohio 45479

(803) 939-6505  
(803) 939-5099 (fax)

APR 21 2005